IN THE CIRCUIT COURT OF KEMPER COUNTY, MISSISSIPPI

PAULA CALLEJAS TREJO, TERESA LUGO CALLEJAS, CATALINA LUGO CALLEJAS, ANTONIO LUGO CALLEJAS, CLEMENTINA LUGO, AND LAURENTINA LUGO, INDIVIDUALLY AND AS THE WRONGFUL DEATH BENEFICIARIES OF GUILLERMO LUGO-CALLEJAS, DECEASED

PLAINTIFFS

VS.

CIVIL ACTION NO. 2020-CV-46-BB

OVERNIGHT PARTS ALLIANCE, LLC and WHOLESALE PARTS ALLIANCE, LLC and STEVEN MCKINNEY, INDIVIDUALLY and d/b/a OVERNIGHT PARTS ALLIANCE, LLC, and PENSKE TRUCK LEASING CO., L.P.

DEFENDANTS

CLERK'S CERTIFICATION

I, Clerk of Kemper County, Mississippi, hereby certify that the attached are true and correct copies of all papers filed in the above styled and numbered cause, as of this date the same is of record in this office to wit:

GIVEN UNDER MY HAND AND SEAL of office, this the 1 day of 2020.

SHIRLEY STEELE JACKSON, Circuit Clerk, Kemper County, Mississippi

EXHIBIT A

IN THE CIRCUIT COURT OF KEMPER COUNTY, MISSISSIPPI

FILED IN THIS OFFICE

PAULA CALLEJAS TREJO, TERESA LUGO CALLEJAS,
CATALINA LUGO CALLEJAS, ANTONIA LUGO CALLEJAS,
CLEMENTINA LUGO, AND LAURENTINA LUGO,
INDIVIDUALLY AND AS THE HEIRS
AND WRONGFUL DEATH BENEFICIARIES
OF GUILLERMO LUGO-CALLEJAS,

BY

SHIRLEY STEELE JACKSON
CIRCUIT CLERK
KEMPER, COUNTY, MISS

PLAINTIFFS

VS.

DECEASED

CIVIL ACTION NO. 2028 - CV-44 BB

OVERNIGHT PARTS ALLIANCE, LLC and WHOLESALE PARTS ALLIANCE, LLC and STEVEN MCKINNEY, INDIVIDUALLY and d/b/a OVERNIGHT PARTS ALLIANCE, LLC, and PENSKE TRUCK LEASING CO., L.P

DEFENDANTS

COMPLAINT

JURY TRIAL DEMANDED

COMES NOW, Plaintiffs, Paula Callejas Trejo, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, individually and as the heirs and wrongful death beneficiaries of Guillermo Lugo-Callejas, Deceased, and files this their Complaint against the Defendants, Wholesale Parts Alliance, LLC, Overnight Parts Alliance, LLC and Steven McKinney, individually and d/b/a Overnight Parts Alliance, LLC, and Penske Truck Leasing Co., L.P., and for cause, would show unto the Court the following facts, to-wit:

The Decedent, Guillermo Lugo-Callejas, was at the time of his death, a citizen of the Country of Mexico. At the time of his death, he was residing at 312 South Jefferson Street, Macon, Noxubee County, Mississippi 39341. At the time of his death he was survived by Paula Callejas Trejo, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, who are his legally designated heirs and wrongful death beneficiaries pursuant to Mississippi law. Plaintiff, Joan Torres, having been the petitioner of heirship filed on behalf of the Plaintiffs, who are resident citizens of the Country of Mexico and reside in Mexico. Said Petitioner, Joan Torres, files in addition on behalf of these wrongful death beneficiaries as allowed by the state law.

PARTIES

1.

That the Plaintiffs, Paula Callejas Trejo, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, individually and as the heirs and wrongful death beneficiaries of Guillermo Lugo-Callejas, Deceased, are adult residents of the country of Mexico.

2.

That Defendant, Wholesale Parts Alliance, LLC is a foreign corporation whose principal place of business is in Irondale, Alabama and who may be served with process of service through its' registered agent, Marvin S. Windham, at 210 Automation Way, Irondale, Alabama 35210.

3.

That Defendant, Overnight Parts Alliance, LLC, is a foreign corporation whose principal place of business is in Irondale, Alabama and who may be served with process of

service through its' registered agent, Marvin S. Windham, 210 Automation Way, Irondale, Alabama 35210.

4.

That Defendant, Steven McKinney, is an adult resident citizen of Cullman County, Alabama and resides at 408 Lake Nola, Hayden, Alabama 35079, and he may be served with process of this Honorable Court at this address pursuant to state law, via personal service as an operator and employee of Overnight Parts Alliance, LLC and/or Wholesale Parts Alliance, LLC at the time this action accrued.

5.

Defendant, Penske Truck Leasing, Co., L.P. ("Penske"), is a limited partnership or joint venture of Penske Corporation, Penske Automotive Group, and Mitsui & Co., headquared in Reading, Pennsylvania. Penske may be served with process of this Court by serving the same upon its registered agent for service of process in the State of Mississippi, to-wit: Corporation Service Company, 7716 Old Canton Road, Suite C, Madison, Mississippi 39110.

JURISDICTION AND VENUE

6.

Jurisdiction and venue are proper in the Circuit Court of Kemper County Mississippi, as the collision that gives rise to this cause of action occurred in Kemper County, Mississippi.

FACTS

7.

That on or about June 3, 2019, Decedent, Guillermo Lugo-Callejas, was traveling in a 15-passenger van owned by Anthony Sharp, in the eastbound lane of Highway 16 near the intersection of Lovers Lane and Highway 16 at or near N 32 49.756 W 088 25.244. The other driver, Steven McKinney, was operating a box truck owned or leased by Wholesale Parts Alliance, LLC and/or Overnight Parts Alliance, LLC, and was traveling westbound on Highway 16 when he crossed over the center line into oncoming traffic and collided head on with the van carrying the Decedent, David Lugo-Callejas. The collision occurred completely in the eastbound lane of traffic and the actions of Defendant McKinney were the sole proximate cause of the collision.

Steven McKinney was an agent and employee of Overnight Parts Alliance, LLC and Wholesale Parts Alliance, LLC and as such, said Defendants are liable for the actions of the Defendant driver.

8.

Penske Truck Leasing Co., L.P. is a commercial business who leases and/or sells commercial box trucks to other commercial entities such as and including Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC. Penske provides these vehicles that are customized based on the requirements and/or needs of the Defendant Lessee. This joint enterprise causes independent negligence on behalf of Penske Truck Leasing Co., L.P., specifically identifying causative conduct and/or negligence on behalf of Penske as a provider of the vehicle in question.

COUNT ONE - NEGLIGENCE

9.

That the Plaintiffs contend the Defendants, Wholesale Parts Alliance, LLC, Overnight Parts Alliance, LLC, and it employee, Steven McKinney, were jointly, severally and/or concurrently negligent and that such joint, several and/or concurrent negligence proximately caused or contributed to the collision and ultimately to the death of Guillermo Lugo-Callejas.

10.

That the Defendants, Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC is vicariously liable for the negligence of its employee, Steven McKinney, who was both acting within the course and scope of his employment at the time of the collision.

11.

That Defendants, Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC's employee, Steven McKinney, while acting within the course and scope of his employment, was negligent in the following manner(s):

- a. Failing to control the movement and momentum of his commercial vehicle;
 - In carelessly and negligently failing to observe the vehicle in which plaintiffs' decedent were riding;
 - c. Operating the vehicle in excessive and reckless speed and in violation of Safety Regulations as adopted by the State of Mississippi, pertaining generally to the operation of box trucks and vehicles and particularly in adverse driving conditions;

- d. In violating certain Regulations and laws as adopted by the State of
 Mississippi which amounts to <u>negligence per se</u>;
- e. Failing to keep proper lookout;
- f. Failure to make a last chance maneuver to avoid striking plaintiffs' decedents' vehicle; and
- g. In willfully and wantonly operating the box truck in such a manner as to evidence a willful disregard for the rights of the traveling public and a willful disregard of the state law.
- Driving while impaired in a hazardous, reckless manner or constituting gross negligence.

12.

That at all times complained of herein the Defendants and its' employees were negligent in one or more of the following aspects which caused or proximately contributed to the death of Lugo:

- Failing to properly maintain and secure the commercial vehicle
 and load which struck the plaintiffs' decedents vehicle;
- In violation of statutes, regulations, and law as adopted by the
 State of Mississippi, pertaining generally to the operation of
 motor vehicles and trucks particularly in said driving conditions;

13.

Plaintiffs would show that at all times relevant hereto, the Defendants, along with Defendant driver, were either licensed through or subject to applicable state law governing

commercial drivers' license. At all times complained of herein, the Defendant was disregarding applicable state law.

14.

Plaintiffs further acknowledge other significant violations and reckless actions on part of the Defendants driver and company regarding the condition of the truck and condition of the river approximately caused and contributed to the collision in question. Plaintiffs further reserve the right to amend these allegations as continued investigation and discovery is ongoing. Said duty amounts to gross negligence.

15.

Defendant, Penske Truck Leasing Co., L.P., has independent liability, separate and distinct from that of the remaining Defendants. Penske is in the specialized business of providing custom vehicles or box trucks to commercial transport companies, such as the Overnight Parts Alliance and Wholesale Parts Alliance Defendants. Penske customizes these trucks specifically to accommodate the needs of said Defendants. In this case, the Defendant, Penske provided a 2020 Sku box truck manufactured by International. Penske knew that the business enterprise in the joint venture with Overnight Parts Alliance, LLC, provided that Overnight would be utilizing these trucks to drive long distances in potentially dangerous conditions with specifically being foreseeable to have drivers that may be fatigued or impaired. Investigation revealed that the driver, Steven McKinney, was extremely fatigued and impaired before and at the time of the collision. Based on the lack of proper alarms, controls or safety devices that were not properly utilized or operating on the truck owned, customized and provided by Penske, the driver was inadequately alarmed and was otherwise

allowed to continue his impaired driving in a reckless and grossly negligent manner and as such the independent negligent actions of Penske in providing this vehicle contributed to the accident and gross negligence of McKinney and Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC contributing to the death of Mr. Callejas.

COUNT TWO

CAUSATION AND DAMAGES

16.

Plaintiffs re-allege and incorporate by reference all of the above allegations contained in this Complaint and would further allege and show that the actions of the Defendants herein, as complained above, were the proximate cause or proximate contributing cause of the injuries and death of Plaintiffs' decedent, Guillermo Lugo-Callejas.

17.

As the direct and proximate result of the combined and/or concurrent acts and omissions of the Defendants and their employee, Plaintiffs have suffered the loss of association, love, affection, and the loss of enjoyment of life, mental pain and suffering of Plaintiffs and decedent, emotional distress, survival claims, medical, funeral/burial expenses and all other damages allowed under the Wrongful Death Act as set forth in the Mississippi Code of 1972 Annotated as Amended, and other claims as allowable for the actions aforesaid pursuant to Mississippi law.

COUNT THREE

WANTON, RECKLESS, MALICIOUS OR WRONGFUL CONDUCT IN GROSS DISREGARD FOR OTHERS RIGHTS

18.

Plaintiffs re-adopt, re-allege and incorporate each and every allegation set forth in the paragraphs preceding herein and makes the same a part of this Count.

19.

Plaintiffs contend Defendants and their employees were herein grossly negligent as previously stated in this Complaint which includes reckless operation while driving. Moreover, the defendants were in blatant violation of regulations adopted by the state of Mississippi which caused or contributed to the death of Guillermo Lugo-Callejas and for which punitive damages should be awarded. Such actions/inactions and gross negligence place the traveling public at an extreme risk and therefore punitive damages, as allowed by law, should be awarded to prevent such occurrences in the future.

20.

Specifically, Defendant businesses Overnight Parts Alliance, LLC and Wholesale Parts Alliance, LLC, is in the business of delivering automobile parts traveling over large distances and delivering these parts in what is advertised as an expedited manner. Plaintiffs believe the actions on the parts of the Defendants in allowing a fatigued and impaired driver delivering these parts overnight under these facts amounted to gross negligence or reckless operation of a commercial vehicle. Specifically, the facts will reveal before the accident, the

Defendant Steven McKinney was fatigued and/or possibly impaired while driving the vehicle and at least in the approximately five (5) miles before the accident, had repeatedly fallen asleep or was fatigued and driving in a reckless and dangerous manner. All Defendants knew or should have known of his impaired condition created an inherently dangerous situation which ultimately caused the death of Guillermo Lugo-Callejas. The conduct on the part of the Defendants in advertising and using their business to expeditiously deliver parts over long distances created a heightened duty to take precautions to prevent fatigued drivers who are driving for extended overnight periods. In this case, the Defendant driver was caused and allowed to drive in a fatigued, impaired manner, without proper precautions to prevent such needless, inherently dangerous conditions which proximately caused or contributed to the Decedent's death.

21.

The Defendants, Overnight Parts Alliance, LLC, Wholesale Parts Alliance, LLC, Steven McKinney and Penske Truck Leasing Co., L.P., actions aforesaid proximately caused the collision in question which resulted in the death of Guillermo Lugo-Callejas

WHEREFORE, PREMISES CONSIDERED, Plaintiffs, Paula Callejas Trego, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, the heirs and wrongful death beneficiaries of Guillermo Lugo-Callejas, Deceased, demand judgment of and from the Defendants, Wholesale Parts Alliance, LLC, Overnight Parts Alliance, LLC, Penske Truck Leasing Co., L.P. and Steven McKinney, individually and d/b/a Overnight Parts Alliance, LLC in an amount for actual and punitive

damages to be determined by a jury along with pre-judgment and post-judgment interest, as well as attorney fees and all costs of this action.

Plaintiffs request such other relief as they may be entitled in the premises.

THIS the 3 day of 5, 2020.

RESPECTFULLY SUBMITTED,

ERNESTINA MARTINEZ, MARIA TERESA LUGO MARTINEZ, AND ERIKA LUGO MARTINEZ, THE WRONGFUL DEATH BENEFICIARIES OF GUILLERMO LUGO-CALLEJAS, DECEASED

BY:

STEVENS (MSB #8528)

OF COUNSEL:

JIM GRENFELL (MSB #8528) **GRENFELL & STEVENS**

P.O. BOX 16570

Jackson, MS 39236-6570

Telephone: (601) 366-1900 Facsimile: (601) 366-1799 Email: jstevens91@aol.com

> STATE OF MISSISSIPPI KEMPER COUNTY

I CERTIFY THAT THIS IS A TRUE AND CORRECT COPY

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IN THE CIRCUIT	COURT OF KEMPER	COUNTY, MISSISSII	PPI
	JUDICIAL DISTRICT,	CITY OF Dekalb	
PLAINTIFF	Clerk's Local ID S IN REFERENCED CAUSE - P PLAINTIFF SHOWN ON CIVIL (Docket No. If Filed Prior to 1/1/94 Page 1 of Plaintiffs Pages CASE FILING FORM COVER SHEE	
Plaintiff #2:			
Individual: Callejas	Teresa First Name	(Maiden Name, if Applicable) L Middle	Init. Jr/Sr/III/IV
Check (/) if Individual Plaintiff is a		Administrator(trix) of an Estate, and en	
	cting in capacity as Business Owner	r/Operator (D/B/A) or State Agency, and	enter that name below:
Business Enter legal name of bus	siness, corporation, partnership, agency - If Co	rporation, indicate state where incorporated	
Check (/) if Business Plaintiff is filing		r than the name above, and enter below	<i>r</i> :
ATTORNEY FOR THIS PLAINTIFF: 8528	Bar # or Name: John H. Stevens	Pro Hac Vice (✓) Not	an Attorney()
Plaintiff #3:			
Check (✓) if Individual Plaintiff is an Estate ofCheck (✓) if Individual Plaintiff is an		r Administrator(trix) of an Estate, and en	ater style:
BusinessEnter legal name of busCheck (✓) if Business Plaintiff is filing.	siness, corporation, partnership, agency - If Co	rporation, indicate state where incorporated er than the name above, and enter below	v:
ATTORNEY FOR THIS PLAINTIFF: 8528	Bar # or Name: John H. Stevens	Pro Hac Vice (✓) No	an Attorney(🗸)
Plaintiff #4:			
Individual: <u>Callejas</u> Last Name Check (✓) if Individual Plaintiff is an Estate of		() L	a Init. Jr/sr/IIVIV nter style:
		r/Operator (D/B/A) or State Agency, and	I enter that name below
Business Enter legal name of bus	siness, corporation, partnership, agency - If Co	rporation, indicate state where incorporated	
	ng suit in the name of an entity other	er than the name above, and enter below	v:
ATTORNEY FOR THIS PLAINTIFF: 8528	Bar # or Name: John H. Stevens	Pro Hac Vice (✓) No	t an Attornev(✓)

IN THE CIRCUIT COURT OF KEMPER COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF Jokalh
200
Docket No. Honological No. Clerk's Local ID Docket No. If Filed Prior to 1/1/94
PLAINTIFFS IN REFERENCED CAUSE - Page of Plaintiffs Pages IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET
Plaintiff # 5_:
Individual: Lugo Clementina (Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV
Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
Estate of
Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below
D/B/A
Enter legal name of business, corporation, partnership, agency - If Corporation, Indicate state where incorporated Check (/) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
D/B/A
ATTORNEY FOR THIS PLAINTIFF: 8528 Bar # or Name: John H. Stevens Pro Hac Vice (/) Not an Attorney(/)
Plaintiff # 6 :
Individual: Lugo Last Name Laurentina (Maiden Name, Il Applicable Middle Init. Jr/5/7/ILI/IV
Check () if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
Estate of
Check () if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below
D/B/A
Business Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated
Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
D/B/A
ATTORNEY FOR THIS PLAINTIFF: 8528 Bar # or Name: John H. Stevens Pro Hac Vice () Not an Attomey()
Plaintiff # :
Individual: (
Check (🗸) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
Estate of
Check (/) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name belo D/B/A
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated Check () if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
D/B/A
ATTORNEY FOR THIS PLAINTIFF:Bar # or Name: Pro Hac Vice () Not an Attorney(/)

IN THE CIRCUIT COURT	OF KEMPER	County, Missis	SSIPPI
/O <u></u> Judio	CIAL DISTRICT, CI	ту оf <u>Де Ка 16</u>	- .
Docket No. 2000 - Chronological No. DEFENDANTS IN REFERENTIN ADDITION TO DEFENDANT SHO	BB Clerk's Local ID CED CAUSE - Pag OWN ON CIVIL CA	Docket No. If Filed Prior to 1/1/94 ge 1 of Defendants Page ASE FILING FORM COVER S	s
Defendant #2:			
Individual: Last Name		(Maiden Name, if Applicable)	Middle Init Jr/Sr/IIVIV
Check (✓) if Individual Defendant is acting in capacity			
Estate of			
Check (🗸) if Individual Defendant is acting in capacity			and enter that name below:
Business Wholesale Parts Alliance, LLC Enter legal name of business, corporation, part	nombio propov - If Corpor	ation indicate state where incomprated	
Check (✓) if Business Defendant is being sued in the D/B/A	name of an entity oth		nter below:
ATTORNEY FOR THIS DEFENDANT:Bar # or Name:		Pro Hac Vice (✔)	Not an Attorney(✓)
Defendant #3:			
Individual: McKinney Steven Last Name Check (✓) if Individual Defendant is acting in capacit Estate of	y as Executor(trix) or		
✓ Check (✓) if Individual Defendant is acting in capacity	as Business Owner/C		
BusinessEnter legal name of business, corporation, parCheck (✓) if Business Defendant is being sued in the D/B/A			nter below:
ATTORNEY FOR THIS DEFENDANT:Bar # or Name:		Pro Hac Vice (√)	Not an Attorney(✓)
Defendant #4:			
Individual:	First Name	(Maiden Name, if Applicable)	Middle Init. Jr/Sr/III/IV
Check (✓) if Individual Defendant is acting in capacit	y as Executor(trix) or	r Administrator(trix) of an Estate,	
Check (🗸) if Individual Defendant is acting in capacity D/B/A	as Business Owner/C	Operator (D/B/A) or State Agency,	and enter that name below:
Business Penske Truck Leasing Co., L.P. Enter legal name of business, corporation, par	tnership, agency - If Corpo	ration, indicate state where incorporated	
Check (✓) if Business Defendant is being sued in the			elow:
ATTORNEY FOR THIS DEFENDANT: Bar # or Name:	72.00	Pro Hac Vice (✓)	Not an Attornev(✓)

	IN THE <u>CIR</u>	CUIT	COURT OF KEM	IPER	COUNTY, MISS	ISSIPPI
		10	JUDICIAL DIS	TRICT, CI	TY OF	
Docket No		Chronologic			Docket No. If Filed Prior to 1/1/94	
					e of Defendants Pag SE FILING FORM COVER	
Defendant#_	_:					
Individual:	Last Na	me	First Name	(Maiden Name, if Applicable	Middle Init. Jr/Sr/IIVIV
Check (/) if I	Individual Def	fendant is a	cting in capacity as Execu	utor(trix) or	Administrator(trix) of an Estate	, and enter style:
			ting in capacity as Busines	200 AND 110 AND 15	perator (D/B/A) or State Agency	, and enter that name below:
Business	Enter legal r	name of busine	ss, corporation, partnership, ager	ncy - If Corpora	tion, indicate state where incorporated	
Check (/) if E	Business Defe	endant is be	ing sued in the name of a	n entity oth	er than the name above, and e	enter below:
					Pro Hac Vice (✓)	_ Not an Attorney(✓)
Defendant #_						
Check (🗸) if I	ndividual Def	endant is a		utor(trix) or	Administrator(trix) of an Estate	Middle Init. Jr/Sr/III/IV , and enter style:
Check (/) if I	ndividual Defe	endant is ac		s Owner/Op	perator (D/B/A) or State Agency	, and enter that name below:
Check (/) if B	Enter legal r Business Defe	name of busine endant is be	ss, corporation, partnership, ager ing sued in the name of a	ncy - If Corpora an entity oth	tion, indicate state where incorporated ter than the name above, and e	enter below:
			Bar # or Name:		Pro Hac Vice (√)	Not on Attornay (1)
Defendant #			Dat # Of Ivallie,		FIO HAC VICE (4)_	
Individual:	Last Na		First Name		Maiden Name, if Applicable) Administrator(trix) of an Estate	2
Check (/) if I	ndividual Defe	endant is ac		s Owner/O	perator (D/B/A) or State Agency	
					ulion, indicate state where incorporated	
Check () if B	usiness Defe	ndant is be	ss, corporation, partnership, agei	n entity oth	er than the name above, and	enter below:
			Bar # or Name:			Not an Attornov(()

CHILD SUPPORT INFORMATION SHEET

Please include all information known

TT COUNTY MISSISSIPPI

		IN THE C	RCUIT	_ ▼ Cou	JRT OF	KEMPE	R	国CC	DUNTY, MISSISSIPPI	
		_		▼ Ju	JDICIAL	DISTRIC	ст, Сіту оғ			
Docket No.									Docket No. If Filed	
DOCKET NO.	File Yr	Chr	onological N	o.	Clerk's	Local ID		*1	Prior to 1/1/94	
Father	Last		Firs	ŀ		M/I	Jr/Sr etc.	·-	Date of Birth	Social Security #
Address:								<i>(</i>)		
Address.		-							Phone #	Drivers License #
Employer Nam	e and Address	:							() .	Employer Phone #
Mother	Last		Firs	t			Jr/Sr etc.	_	Date of Birth	Social Security #
Address:								()	Phone #	Drivers License #
Employer Nam	e and Address	:							()	Employer Phone #
Child:	Last		Firs			M/I	Jr/Sr etc.	-	Date of Birth	Social Security #
Address:							JI/31 etc.		Phone #	Codd Coddiny ii
Child:									04014.000000000000000000000000000000000	
	Last		Firs	st		M/I	Jr/Sr etc.	,	Date of Birth	Social Security #
Address:	***************************************				er-westerness				Phone #	
Child: _	Last		Firs	at .			Jr/Sr etc.	,	Date of Birth	Social Security #
Address:	Last						01/01/010.	() Phone #	,
Child:										
	Last		Fire			M/I	Jr/Sr etc.		Date of Birth	Social Security #
Address:							•	(Phone #	

FOR ADDITIONAL CHILDREN, PLEASE ATTACH ADDITIONAL FORMS

MANDATED PURSUANT TO: Federal Social Security Act Title IV-D, §§ 454(26)(A) and 454A(e)(4); Miss. Code Ann. §43-19-31(I)(iii) (Supp. 1999)

Information will be sent to the ADMINISTRATIVE OFFICE OF COURTS AND MDHS CHILD SUPPORT ENFORCEMENT DIVISION